

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

BALDEO SAHABIR and KAMLA SAHABIR,

Defendants.

**NOTICE OF
MOTION**

Indictment No. 09-
CR-507 (DNH)

Motion By:	Defendant, Baldeo Sahabir
Date, Time and Place:	October 8, 2010 U.S. District Court Utica, New York
Supporting Papers:	Memorandum of Law with attached exhibits
Nature of Action:	Motion pursuant to Rule 29 and Rule 33
Relief Demanded:	Order granting Rule 29 and Rule 33 motions

The Defendant, Baldeo Sahabir, joins in, incorporates by reference, and adopts all arguments made by the Co-Defendant, his wife, which challenge the verdict pursuant to Rule 29 or Rule 33 of the Federal Rules of Criminal Procedure.

DATED: September 15, 2010

O'CONNELL AND ARONOWITZ
By:

/s/Stephen R. Coffey, Esq.

Stephen R. Coffey, Esq.

Bar Roll No. 101370

Attorneys for Defendants
Office and P.O. Address
54 State Street
Albany NY 12207-2501
(518) 462-5601

TO: United States District Court
Office of the Clerk
U.S. Courthouse and Federal Building
10 Broad Street
Utica NY 13501

Hon. David N. Hurd
United States District Court Judge
United States District Court
U.S. Courthouse and Federal Building
10 Broad Street
Utica NY 13501

United States Attorney's Office
Edward Broton, Esq., AUSA
U.S. Courthouse and Federal Building
Room 900
100 South Clinton Street
Syracuse NY 13261

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK
Indictment No. 09-CR-507 (DNH)

CERTIFICATE OF SERVICE

I, Stephen R. Coffey, Esq., attorney of record for the above-named Defendant, hereby certifies that on September 15, 2010, I electronically filed the foregoing Notice of Motion seeking relief under Rule 29 and Rule 33 and Memorandum of Law with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to Edward Broton, Esq., Assistant U.S. Attorney.

DATED: September 15, 2010

O'CONNELL AND ARONOWITZ

By:

/s/Stephen R. Coffey, Esq.

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